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September 12, 2014

The Honorable Martha Coakley  
Attn: Antitrust Division  
Office of Attorney General  
One Ashburton Place, 18<sup>th</sup> Floor  
Boston, MA 02108

Madam Attorney General:

On behalf of the Board of Trustees for Hallmark Health System, Inc., I respectfully submit the following comments for your consideration in the matter of the Consent Agreement between your office and Partners HealthCare.

As you know, Hallmark Health is a system of care, comprised of community hospitals, physician practices, ancillary and community-based services covering a geographic area north of Boston.

Collectively, the components of our health care system have been providing care and services to our communities for more than 100 years. In recent years, however, our ability to provide comprehensive, high quality services as a stand-alone community system has become increasingly difficult.

Specifically, a number of challenges in health care reform have led to a decline in revenue and patient volume in our health care system. To respond in a timely way to these negative trends, the Board of Trustees of Hallmark Health has sought to merge with Partners HealthCare, to provide increased community health care services in our service area at affordable community health care rates.

Hallmark Health and Partners HealthCare have a long-standing relationship through clinical collaboration that spans almost 20 years. Becoming one entity at this time is a natural step for both organizations, and it is a necessary step for the future of healthcare delivery in our core communities.

As you have seen from materials submitted earlier to your office, Partners HealthCare and Hallmark Health will 1) build a robust system of integrated services in cost-efficient community settings; 2) combine resources and talent to manage population health needs through local clinical programs; and 3) make investments to improve quality local health care in our communities. We are prepared to be successful in all three areas.

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During this summer's public hearings on Hallmark Health's request to merge with Partners HealthCare, eighty-five residents, public officials, patients and interested parties testified to the Massachusetts Public Health Council in favor of the merger. As representatives and stewards of this community support, Hallmark Health's Board of Trustees is pleased to endorse the Consent Agreement to allow the merger to go forward.

Thank you for the opportunity to comment on this matter.

Sincerely,



James F. Herrington  
Chairman, Hallmark Health System, Inc.